

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

NOAH JAVARIS ABRAHAM;
WILLIAM CHRISTOPHER OLSEN; and
JASEYONA SAGE THOMAS

INDICTMENT

Case No. _____

Violations: 21 U.S.C. §§ 841(a)(1),
841(b)(1)(B), and 846; and 18 U.S.C.
§§ 922(g)(1), 924(a)(8), 924(c)(1)(A),
and 2

COUNT ONE

**Conspiracy to Distribute and Possess with Intent to Distribute
Controlled Substances**

The Grand Jury Charges:

Beginning in or about 2023 and continuing until in or about May 2024, in the
District of North Dakota, and elsewhere,

NOAH JAVARIS ABRAHAM;
WILLIAM CHRISTOPHER OLSEN; and
JASEYONA SAGE THOMAS

knowingly and intentionally combined, conspired, confederated, and agreed with others,
both known and unknown to the grand jury, to distribute and possess with intent to
distribute controlled substances, including a mixture and substance containing a
detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
propanamide”), a Schedule II controlled substance; in violation of Title 21, United States
Code, Sections 841(a)(1) and 841(b)(1)(C).

Drug Quantity

With respect to NOAH JAVARIS ABRAHAM, the amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”) involved in the conspiracy attributable to this individual as a result of that individual’s own conduct, and the conduct of other conspirators reasonably foreseeable to that individual, is 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), in violation of Title 21, United States Code, Section 841(b)(1)(A).

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did distribute, and possess with intent to distribute, opiate pills and tablets containing a detectable amount of fentanyl in and about Bismarck, Mandan, and Minot, North Dakota, and elsewhere;
2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities by, among other things, using aliases and concealing controlled substances within motor vehicles and containers;
3. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;
4. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, and social media

applications, to facilitate the distribution of controlled substances and collection and transfer of drug proceeds;

5. It was further a part of said conspiracy that the defendants used other individuals and conspirators as sub-distributors of opiate pills and tablets containing a detectable amount of fentanyl;

6. It was further a part of said conspiracy that Defendant NOAH JAVARIS ABRAHAM traveled in a motor vehicle from Minot, North Dakota, to Fargo, North Dakota, and elsewhere, to acquire and obtain opiate pills and tablets containing a detectable amount of fentanyl for further distribution;

7. It was further a part of said conspiracy that in or about May 2024, the Defendant NOAH JAVARIS ABRAHAM possessed opiate pills and tablets containing a detectable amount of fentanyl in a motor vehicle while in Burleigh County, North Dakota, and elsewhere; and

8. It was further a part of said conspiracy that conspirators possessed firearms to protect their supply of controlled substances and the proceeds of their drug trafficking activities, and to intimidate others;

In violation of Title 21, United States Code, Section 846, and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

**Possession with Intent to Distribute Controlled Substances
(40 grams or more Fentanyl)**

The Grand Jury Further Charges:

In or about May 2024, in the District of North Dakota, and elsewhere,

NOAH JAVARIS ABRAHAM,

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, approximately 2,000 opiate pills and tablets that were 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THREE

Possession of a Firearm and Ammunition by a Prohibited Person

The Grand Jury Further Charges:

In or about May 2024, in the District of North Dakota, and elsewhere,

NOAH JAVARIS ABRAHAM

knowing that he had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, to wit:

- (a) Terrorizing, a felony, in United States District Court for the District of North Dakota, Case No. 1:16-cr-266-02; and
- (b) Possession of Ammunition by a Prohibited Person, a felony, in United States District Court for the District of North Dakota, Case No. 1:20-cr-049;

individually, and by aiding and abetting, did knowingly possess in and affecting commerce a firearm, namely, one FN Herstal, Model Five Seven, 5.7 x 28 caliber pistol, Serial Number 386277058, and approximately 20 rounds of FN Herstal 5.7 mm x 28 mm ammunition;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(8) and 2.

COUNT FOUR

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

The Grand Jury Further Charges:

Beginning sometime prior to, and continuing until, on or about May 2024, in the District of North Dakota, and elsewhere,

NOAH JAVARIS ABRAHAM,

individually, and by aiding and abetting, knowingly possessed one or more firearms, namely, a FN Herstal, Model Five Seven, 5.7 x 28 caliber pistol, Serial Number 386277058, in furtherance of a drug trafficking crime for which NOAH JAVARIS ABRAHAM may be prosecuted in a court of the United States, namely: (i) Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances, as alleged in Count One of this Indictment; and (ii) Possession with Intent to Distribute Controlled Substances, as alleged in Count Two of this Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

FORFEITURE NOTICE

Upon conviction of Counts One, Two, Three, and Four as alleged in this
Indictment,

NOAH JAVARIS ABRAHAM,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d),
and Title 28, United States Code, Section 2461(c), and Title 21, United States Code,
Section 853, all firearms and ammunition involved in the commission of the offenses,
including, but not limited to:

- One FN Herstal, Model Five Seven, 5.7 x 28 caliber pistol, Serial Number 386277058;
- Approximately 20 rounds of FN Herstal 5.7 mm x 28 mm ammunition.

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Mac Schneider
MAC SCHNEIDER
United States Attorney

RLV/js